IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Ashley Reeves as Personal Representative of the Estate of Albert Carl "Bert" Reeves, Plaintiff, v. The Town of Cottageville, The Town of Cottageville Police Department and Randall Price, individually, Defendants.	Case No. 2:12-cv-02765-DCN **MOTION FOR SANCTIONS AGAINST DEFENDANTS' COUNSEL FOR VIOLATION OF FED. R. CIV. P. 11(b)**

COMES NOW Plaintiff Ashley Reeves, as personal representative of the estate of Albert Carl "Bert" Reeves, by and through her undersigned counsel, pursuant to Federal Rule of Civil Procedure 11(c) and respectfully moves this Honorable Court to impose sanctions against Defendants' counsel and their respective law firms for violation of Fed. R. Civ. P. 11(b). Defendants' counsel violated the federal rule when they filed Defendants' Joint Motion to Disqualify the Plaintiff's Counsel and his Law Firm from Further Representation of the Plaintiff in the Instant Matter (Dkt. No. 109), presenting the motion to the Court without evidentiary support for their factual contentions and instead frivolously making the motion for the improper purposes of causing unnecessary delay in the lawsuit, needlessly increasing the cost of litigation, and harassing Plaintiff.

Plaintiff supports her motion with Plaintiff's Memorandum in Opposition to Defendants' Joint Motion to Disqualify Plaintiff's Counsel. (Dkt. No. 118). Moreover, Plaintiff respectfully requests that the Court award her the reasonable expenses incurred in bringing this motion, as well as the additional expenses and attorneys' fees that were unnecessarily incurred in impaneling a jury and preparing for the start of trial on August 11, 2014, which was delayed due to Defendants' frivolous motion, as well as the attorneys' fees incurred in responding in opposition to the frivolous motion. See Fed. R. Civ. P. 11(c)(2) & (4); and Exhibit A, Affidavit of W. Mullins McLeod, Jr. Plaintiff also requests that the Court impose any other sanctions it determines sufficient to deter repetition of Defendants' counsel's conduct by others similarly situated. Id.

Respectfully submitted,

McLEOD LAW GROUP, LLC
Post Office Box 21624
Charleston, South Carolina 29413
(843) 277-6655

/s/ W. Mullins McLeod, Jr.

W. Mullins McLeod, Jr.
Fed ID No.: 7142

James B. Moore III
Fed ID No.: 10844

August 15, 2014
Charleston, South Carolina

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all CM/ECF participating attorneys, and I hereby certify that I have mailed the document to non CM/ECF participants.

McLEOD LAW GROUP, LLC
Post Office Box 21624
Charleston, South Carolina 29413
(843) 277-6655

/s/ W. Mullins McLeod, Jr.

W. Mullins McLeod, Jr.
Fed ID No.: 7142

James B. Moore III
Fed ID No.: 10844

August 15, 2014
Charleston, South Carolina